### STIPULATION

This is a Stipulation by Jeannette Fuller Hausler, as Personal Representative of the Estate of Robert Otis Fuller, Deceased, Thomas Caskey, as Personal Representative of the Estate of Lynita Fuller Caskey, Surviving Daughter of Robert Otis Fuller, the Estate of Robert Otis Fuller, Frederick Fuller, Frances Fuller, Grace Lutes, Jeannette Fuller Hausler, and Irene Moss.

WHEREAS Jeannette Fuller Hausler, as Personal Representative of the Estate of Robert Otis Fuller, Deceased, Thomas Caskey, as Personal Representative of the Estate of Lynita Fuller Caskey, Surviving Daughter of Robert Otis Fuller, the Estate of Robert Otis Fuller, Frederick Fuller, Frances Fuller, Grace Lutes, Jeannette Fuller Hausler, and Irene Moss (collectively, the "Fuller/Hausler Plaintiffs") are judgment creditors in the case styled as Jeannette Hausler et al. v. The Republic of Cuba et al., Case No. 02-12475 CA 04, Circuit Court of the 11th Judicial Circuit in and for Miami-Dade County, Florida;

WHEREAS, on or about December 19, 2006, Gary Anderson served a writ of execution upon Garnishee AT&T Corp. (the service of such Writ on AT&T Corp. being referred to herein as the "Anderson Writ");

WHEREAS, on March 23, 2001, in the case styled as Ana Margarita Martinez v. The Republic of Cuba, Case No. 99-18208 CA 20, an amended final judgment was entered in favor of Martinez by the Circuit Court of the 11th Judicial Circuit in and for Miami-Dade County, Florida (the "Martinez Judgment") and Martinez has commenced proceedings in the United States District Court for the Southern District of New York to federalize the Martinez Judgment in that District, which are styled as Ana Margarita

Martinez v. The Republic of Cuba, Case No. 07-CIV-6607 (VM) (the "Martinez Federal Action");

WHEREAS, the Fuller/Hausler Plaintiffs shall not seek any recovery of the tax liabilities that are the subject matter of the turnover proceeding in the case styled Gary Anderson v. AT&T Corp., Cuban American Telephone and Telegraph Company, and JPMorgan Chase Bank, N.A., Case No. 07-civ-7974, pending in the United States District Court for the Southern District of New York (the "Anderson Proceeding");

WHEREAS, those of the Fuller/Hausler Plaintiffs who obtained Writs of Garnishment against AT&T Corp. have dismissed the claim in the Writs of Garnishment against the funds in the blocked account denominated the "AT&T Long Lines Account," Account Number G00875, at JPMorgan Chase Bank, in the approximate amount of \$6 million which AT&T claims are funds deposited by AT&T which are due and owing solely to the Cuban American Telephone and Telegraph Company (CATT) ("the CATT Funds");

# IT IS HEREBY STIPULATED AS FOLLOWS:

- The Fuller/Hausler Plaintiffs do not oppose the turnover sought by Gary 1. Anderson in the Anderson Proceeding and the entitlement of the Estate of Howard Anderson to those funds, including any current or future tax liabilities owed to the Republic of Cuba from the funds deposited in those accounts.
- The Fuller/Hausler Plaintiffs, in Case No. 07-22375 pending in the United 2. States District Court for the Southern District of Florida, have dismissed the claim in the Writs of Garnishment against the funds in the blocked account denominated the "AT&T Long Lines Account," Account Number G00875, at JPMorgan Chase Bank, in the approximate amount of \$6 million which AT&T claims are funds deposited by AT&T

which are due and owing solely to the Cuban American Telephone and Telegraph Company (CATT) ("the CATT Funds").

3. This Stipulation is without waiver of any objections that the Fuller/Hausler Plaintiffs may have to personal jurisdiction, venue, or service of process as to the Anderson Proceeding, or the counterclaim asserted therein by JPMorgan Chase Bank, in the Southern District of New York.

January 28, 2008

#### COLSON HICKS EIDSON

Roberto Martinez Fla. Bar No. 305596

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By: Alfonso J. Perez, Jr. Attorneys for Plaintiffs Frederick Fuller, Frances Fuller, Grace Lutes, and Irene Moss

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January , 2008

#### **COLSON HICKS EIDSON**

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